

From: Dennis J Ponsness, WB0WAO
Subject: WT Docket No. 05-235
To: Federal Communications Commission

Commissioners,

I would like to take the opportunity to comment on WT Docket No. 05-235, Amendment of Part 97 of the Commission's Rules To Implement WRC-03 Regulations Applicable to Requirements for Operator Licenses in the Amateur Radio Service.

The FCC has received 18 separate petitions to change Part 97 to either delete or modify the requirements for Morse testing (Element 1). In your NPRM issued on 19 July 2005, the Commission is proposing to delete all references to Element 1 as a requirement for the Amateur Extra, General, and "Technician Plus" licenses. While I agree that the requirement for Element 1 should be deleted for the General and "Technician Plus" licenses, I would urge the Commission to reconsider its proposal for eliminating the Element 1 requirement for the Amateur Extra license.

Docket No. 05-235 states in paragraph 19. "... we should treat Morse code telegraphy as a communications technique with the same standing as other modulation techniques in the amateur service licensing requirements." I am in agreement with the Commission that all modulation techniques should be treated equally. Morse code telegraphy is unique in the fact that is decoded normally by "ear" rather than by some type of hardware device. Proper use of this mode requires that one have familiarity with Morse code and the only way that this can be done is by the current testing protocol. Other modulation techniques are addressed in the written question pool, in order to ensure that the individual is familiar with at least the basics of that modulation technique. For example, here are several current exam questions taken from the Amateur Extra question pool:

E2B05 (D)

What is the bandwidth of a vestigial sideband AM fast-scan television transmission?

- A. 3 kHz
- B. 10 kHz
- C. 25 kHz
- D. 6 MHz

E2E03 (C)

How is Forward Error Correction implemented?

- A. By transmitting blocks of 3 data characters from the sending station to the

receiving station, which the receiving station acknowledges

B. By transmitting a special FEC algorithm which the receiving station uses for

data validation

C. By transmitting extra data that may be used to detect and correct transmission errors

D. By varying the frequency shift of the transmitted signal according to a predefined algorithm

E2E06 (C)

What is the most common data rate used for HF packet communications?

A. 48 bauds

B. 110 bauds

C. 300 bauds

D. 1200 bauds

E2E07 (B)

What is the typical bandwidth of a properly modulated MFSK16 signal?

A. 31 Hz

B. 316 Hz

C. 550 Hz

D. 2 kHz

According to the current allocations by license class in Part 97, the holder of an Amateur Extra license has exclusive access to the following segments:

80m 3700 – 3725 kHz

3750 – 3775 kHz

40m 7000 – 7025 kHz

20m 14000 – 14025 kHz

14150 – 14175 kHz

15m 21000 – 21025 kHz

21200 – 21250 kHz

In the above allocations, 100 kHz of the exclusive allocation is used for CW operation while only 75 kHz is allocated for phone operation. Since the majority of the additional allocations for Amateur Extra class license holders resides in areas that is exclusively used for CW, it seems that in order to properly utilize these segments, one would need to have some familiarity with the mode being used.

The Commission has reiterated its commitment to “incentive licensing” in numerous sections of this NPRM. I agree with the Commission that the expanded access to different bands in the amateur service is the main drive

behind an individual upgrading their license. An individual upgrading from Technician to General goes from 600 kHz of access on the HF bands to 1825 kHz of access on the MF/HF bands – over a 3 fold increase. However, when an individual upgrades from General to Amateur Extra, they only receive 175 kHz of additional access – and over half of this additional access is in the aforementioned areas in which CW is used exclusively. Although it is not codified that those areas are exclusively used for CW, voluntary band plans indicate that this area is used for CW only. The Commission has indicated that they prefer to have these voluntary band plans instead of having them codified in Part 97. Since the operation in these areas is Morse code, it makes sense that the Amateur Extra operator have some familiarity with Morse code.

In conclusion, I would like to urge the Commission to reconsider it's position to eliminate Element 1 from the requirements for the Amateur Extra license grant.